

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

UNITED STATES OF AMERICA, et al.,  
ex rel. CALEB HERNANDEZ and JASON  
WHALEY, Relators

*Plaintiffs,*

v.

TEAM HEALTH HOLDINGS INC., et al.

*Defendants.*

CASE No. 2:16-cv-00432-JRG

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT, OR PARTIAL SUMMARY  
JUDGMENT IN THE ALTERNATIVE UNDER SEAL**

Defendants, Team Health Holdings, Inc., Team Finance, L.L.C, Team Health, L.L.C., AmeriTeam Services, L.L.C., HCFS Health Care Financial Services, L.L.C. and Quantum Plus, L.L.C. (collectively, "Team Health" or "Defendants"), hereby file this Unopposed Motion for Leave to File Defendants' Motion for Summary Judgment, or Partial Summary Judgment in the Alternative Under Seal.

Defendants' Motion and the exhibits thereto contain highly confidential information, and therefore Defendants respectfully move for leave to file the Motion and the exhibits under seal. Relators do not oppose this motion.

Defendants respectfully request that the Court enter the attached Order granting leave to file their Motion for Summary Judgment, or Partial Summary Judgment in the Alternative, and all Exhibits thereto, under seal.

Dated: September 17, 2020

Respectfully submitted,

By: /s/Eric H. Findlay

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***Counsel for Defendants Team Health Holdings  
Inc., Team Finance, L.L.C., Team Health Inc.,  
Ameriteam Services, L.L.C., HCFS Health Care  
Financial Services, L.L.C., and Quantum Plus,  
L.L.C.***

**CERTIFICATE OF CONFERENCE**

This is to certify that counsel for Defendants have complied with the meet and confer requirement in Local Rule CV-7(h). The personal conference required by Local Rule CV-7(h) was conducted on September 17, 2020. Relators have indicated they are unopposed to this motion.

/s/ Eric H. Findlay  
Eric H. Findlay

**CERTIFICATE OF SERVICE**

This is to certify that on September 17, 2020, all counsel of record were served with the foregoing document *via* CM/ECF and electronic mail.

/s/ Eric H. Findlay  
Eric H. Findlay